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Kurt

From: D. Rick Van Schoik [scerp@mail.sdsu.edu]
Sent: Monday, November 25, 2002 10:42 AM
To: ist@sdenergy.com
Cc: Kurt; A. Sweedler; David Rohy; Paul Ganster
Subject: Fw: REIS comments - for you to forward

Ms. Stillings, Board, and Staff:

Attached please find comments from the Southwest Center for Environmental Research and Policy (SCERP) on the Regional Energy Infrastructure Study (REIS).

As a binational environmental research and policy consortium we are please that Mexican issues are integrated into the effort.

However, given the structure of the study, the makeup of the REPAC, and the expertise of the contracted author of the REIS, SCERP is concerned that environmental concerns are not appropriately addressed. Our comments reflect this precaution.

Please feel free to contact me in this regard.

Regards,

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The Southwest Center for Environmental Research and Policy was disappointed with the lack of attention paid in the San Diego Regional Energy Infrastructure Study to the many environmental issues raised by the generation of energy.

Although one of the stated goals of the region's energy vision is "minimizing the impacts of energy production and use on the environment," the report doesn't do enough to present a comprehensive view of environmental issues related to energy. It does, however, a mighty job of calling environmental restrictions obstacles and hurdles to permitting and building new power plants.

For example, the report devotes little more than one page of 21 to air and water quality issues in the "Situation Assessment" section, and then those issues only relate to the impacts they have on the ability to generate energy. This attitude is disingenuous to the environment, the issues, the public, and the decisionmakers. The public and decision-makers should be presented with a clear, comprehensive outline that presents the environmental problems energy generation creates and the effects on surrounding communities. This will provide an understanding of why environmental restrictions are so important to meet and raise the issue to the level it ought to be in all discussions about energy generation going forward.

Rather than merely talking about the general issues of "environmental concerns"—**REPAC needs to devote concerted time, effort, and resources to developing a specific agenda within the REIS that outlines the variety of environmental issues that walk hand-in-hand with the generation of power. The agenda should also suggest specific actions that can be taken to solve the environmental problems power generation causes.**

As well:

- Specific environmental problems created by energy generation need to be a significant part of the executive summary, and a "key infrastructure" bullet needs to be created outlining environmental issues in general. Note that what needs to be addressed is *the effect of energy generation on the environment*, not the effect of environmental regulations on energy generation. This report tends to focus on the latter.

- Environmental issues need to be addressed in the executive summary section on "The Key Questions." Perhaps one place to start is by answering the questions: How much does it cost to produce cleaner burning energy? How high a rate is the public will to pay if they are protecting the environment in the process?

- More attention should be paid in the executive summary to some interesting findings about DG and renewables that are currently buried within the report. For example, some of the findings about improved air quality with DG and

renewables from section 5.17 should be given more attention—the picture isn't so bleak when many of these hopeful findings are taken together.

- If the vision really involves creating a regional energy approach that protects the environment, the tone of this report must be changed so that the environment is not treated as the red-headed stepchild of this process. The report's tone needs to be altered to give more consideration to real, specific environmental concerns raised by energy generation, not to the concerns the environmental regulation raises for energy generation.

Incidentally, this attitude about the burdens the environment creates for energy generation extends to REPAC meetings where comments from environmental group representatives are held until the public comment period, which is normally given no more than five minutes at the end of the meeting. Speakers are constantly told to make their comments brief and the committee rarely, if ever, addresses the speakers or their concerns because they're too busy gathering their things to leave the meeting. Thus, these comments are rarely really heard by committee members. This report calls for active participation of the community and stakeholders, but no one will participate if they see environmental stakeholders brushed aside and ignored at REPAC meetings.

Within the report, a stakeholder concern is that the environment should be given high "consideration," but the overwhelming worry is about the constraints air emission regulations put on building new power plants—this suggests that environmental stakeholders have not been involved in this process to this point. The committee would do well to meaningfully involve the Sierra Club, the Environmental Health Coalition, and other environmental group representatives that have spent time attending REPAC meetings; reading, understanding, and filing concerns about the RIS; and attempting—usually with little success—to begin a dialog with REPAC members about their specific concerns.